

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES,)	
)	
)	
v.)	No. 92-CR-10369-RWZ-2
)	
ALFRED TRENKLER,)	
<i>Defendant.</i>)	
_____)	

DEFENDANT ALFRED TRENKLER'S MOTION FOR THE COURT
TO ACCEPT A REPLY IN EXCESS OF FIVE (5) PAGES

Pursuant to Local Rule 7.1(b)(3), defendant Alfred Trenkler ("Trenkler") hereby moves, by and through undersigned counsel, for leave for the Court to accept a Reply to the Government's Opposition to his Emergency Motion for Compassionate Release pursuant to 18 U.S.C. § 3582(c)(1)(A) in excess of five (5) pages.

In support of this motion, Trenkler submits, by and through undersigned counsel, that a Reply in excess of five (5) pages was necessary to respond to some, and not all, of the legal and factual arguments raised in the Government's Opposition. Moreover, the Government's opposition consisted of twenty-two (22) pages and contained some misleading information that needed to be corrected.

In addition, undersigned counsel filed a Motion for Leave to File a Reply on Wednesday, January 27, 2021, which was assented to by the government, and did not include a page limitation. Moreover, the Court's Order limiting the Reply to five (5) pages was not entered until Monday, February 1, 2021 and, admittedly, counsel of record did not realize that the Court limited the Reply to 5 pages before filing its

Reply. Indeed, by the time the Court entered its Order granting the Motion for Leave to Reply, counsel of record had already written the Reply, and said Reply was more than 5 pages because of the significant and life-changing issues involved.

Finally, in light of the complexity of the case, the Government's Opposition, the significance of the issues raised, Mr. Trenkler's likely innocence, and his risk of death if the Court does not grant his Motion for Compassionate Release, a Reply in excess of 5 pages was and is necessary in the interests of justice.

WHEREFORE, Mr. Trenkler respectfully requests that the Court allow this motion and accept his Reply in excess of five (5) pages.

Respectfully submitted,
For the Defendant,
ALFRED TRENKLER
By his attorneys,

/s/ Scott P. Lopez
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on February 2, 2021.

/s/ *Scott P. Lopez*
Scott P. Lopez, BBO # 549556